

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

DAVID B. POPKIN FOLLOW-UP INTERROGATORIES TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-142-145]

January 28, 2002

Pursuant to Order No. 1320, I hereby submit follow-up interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

Respectfully submitted,

January 28, 2002

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-142 Please refer to your response to DBP/USPS-137 subpart a. [a] What is the critical entry time at ADC Columbia? [b] If the response to subpart a is 21:50 or later, please explain why the mail from Miami FL 331 and arriving at the ADC at 21:50 will not receive 2-day delivery. [c] Please explain why the mail from P&DC Miami at 05:00 will not receive transportation on Delta flight 1539 departing at 06:50 [with the mail from South Florida P&DC]. [d] Please explain why the mail from Miami P&DC arriving in Atlanta on Delta flight 2246 at 10:14 will not be able to be transported to Columbia on Delta flight 1006 departing Atlanta at 11:50 [with the mail from South Florida P&DC]. [e] With only a 15-20 minute trip between the Columbia AMF/AMC and Columbia ADC, please provide a listing of the trips during the day and if there are any trips after 15:20 and before 21:50, please explain why the mail is not dispatched earlier than 21:50. [f] Please explain the reasons why the Miami P&DC does not dispatch the Columbia ADC mail until 05:00 and what would be necessary to dispatch it earlier.

DBP/USPS-143 Please refer to your response to DBP/USPS-137 subparts c and j. [a] Please advise why there is insufficient data to make the determination. [b] Are records kept of what mail is sent on what flight? [c] Are there any employees who are able to provide an estimate of the percentage?

DBP/USPS-144 Please refer to your response to DBP/USPS-137 subparts b and l. [a] Please confirm, or explain if you are unable to do so, that by placing the scheduled delivery day of the week on the destination label it can also [in addition to the obvious reason for putting the day on the label] increase the likelihood to delay processing this mail during the normal workday and putting it off until a future time thereby achieving delivery on the scheduled date rather than delivering the mail a day earlier than scheduled. [b] Has any study been conducted to evaluate this phenomenon? If so, please provide a copy. [c] What is the policy at the Columbia ADC for processing the mail "ahead of time"? [d] What is the national policy?

DBP/USPS-145 Please refer to your response to DBP/USPS-137 subpart p. [a] Please explain why, since air transportation was in fact being used for mail to Columbia ADC from both Miami and South Florida P&DCs and since the South Florida P&DC mail was upgraded from 3-day to 2-day standard, why the mail from the Miami P&DC was not similarly upgraded. [b] Please explain why the potential for changing the mode of transportation at some time in the future is relevant to your response.

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

January 28, 2002

David B. Popkin